

Exhibit B

Sean A. O'Neal
Jane VanLare
CLEARY GOTTLIEB STEEN & HAMILTON LLP
One Liberty Plaza
New York, New York 10006
Telephone: (212) 225-2000
Facsimile: (212) 225-3999

*Counsel to the Debtors
and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**AFFIDAVIT OF JANE VANLARE IN SUPPORT OF THE DEBTORS' MOTION TO
SHORTEN NOTICE TO CONSIDER DEBTORS' MOTION SEEKING ENTRY OF AN
ORDER (I) APPROVING THE BIDDING PROCEDURES AND RELATED
DEADLINES, (II) SCHEDULING HEARINGS AND OBJECTION DEADLINES WITH
RESPECT TO THE DEBTORS' SALE, AND (III) GRANTING RELATED RELIEF**

I, Jane VanLare, do hereby declare as follows:

1. I am a member of the firm of Cleary Gottlieb Steen & Hamilton LLP (“Cleary Gottlieb” or the “Firm”), counsel to the Debtors in the above-captioned jointly-administered chapter 11 cases. I have personal knowledge of the facts set forth herein.
2. I submit this declaration in support of the *Debtors' Motion to Shorten Notice to Consider Debtors' Motion Seeking an Order (I) Approving the Bidding Procedures and Related*

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number (or equivalent identifier), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); and Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

Dates and Deadlines, (II) Scheduling Hearings and Objection Deadlines with Respect to the Debtors' Sale, and (III) Granting Related Relief (the “Motion to Shorten”), which seeks, in compliance with Local Bankruptcy Rule 9077-1(a), entry of an order shortening the notice period and establishing the hearing and objection dates for the *Debtors' Motion Seeking an Order (I) Approving the Bidding Procedures and Related Dates and Deadlines, (II) Scheduling Hearings and Objection Deadlines with Respect to the Debtors' Sale, and (II) Granting Related Relief* (the “Bidding Procedures Motion”).²

3. As set forth more fully in the Bidding Procedures Motion, the Debtors, in their business judgment and with consultation with the Consultation Parties and the consent of DCG, as it relates to GGT, have developed Bidding Procedures that provide the best path forward to effectuate an efficient Sale process that maximizes recoveries to creditors of the Debtors. A shortened notice period of two weeks will prevent any unnecessary delay in the Sale process, while still providing adequate time for parties to review the Bidding Procedures Motion and the Bidding Procedures set forth therein.

4. No prior motion or application has been made for the relief sought in the Motion to Shorten.

5. Accordingly, the relief requested is necessary and appropriate to maximize the value of the Debtors' estates for the benefit of the Debtors' economic stakeholders.

6. For these reasons, I believe that the proposed notice is adequate and appropriate under the circumstances.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Bidding Procedures Motion.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on March 16, 2023
New York, New York

/s/ Jane VanLare
Jane VanLare